एनटीपीसी ग्रीन एनर्जी लिमिटेड
(एनटीपीसी लिमिटेड की सहायक कम्पनी)
NTPC GREEN ENERGY LIMITED
(A Subsidiary of NTPC Limited)

Ref. No.:CC:CD/NGEL/RTM **Date: 28.05.2026**

The Secretary
Central Electricity Regulatory Commission
7th Floors, Tower B, World Trade Centre,
Nauroji Nagar, New Delhi- 110029

Subject: NGEL submission on Central Electricity Regulatory Commission Discussion Paper regarding Shortening the scheduling Timeline for Real Time Markets in India

Respected Sir,

Hon'ble Commission has issued Discussion Paper regarding Shortening the scheduling Timeline for Real Time Markets in India.

In this regard, please find enclosed submission of NTPC Green Energy limited on the subject discussion paper for kind consideration.

Thanking you,

Yours sincerely,

(Sunit Kumar)
HOD (Commercial & Regulatory Cell)

Submissions on Central Electricity Regulatory Commission Discussion Paper regarding Shortening the scheduling Timeline for Real Time Markets in India

1) *4.3. The existing framework for bilateral transactions provides regional entities with the flexibility to revise their schedule before the 7th to 8th time block of the actual commencement of the delivery time block under the 'Revision of schedule' provision specified in the IEGC. This was necessary to incorporate the RTM framework into the existing scheduling framework. But* ***with the proposed changes to the RTM timeline as above, the schedule revision period can also be shortened****. Accordingly, it is proposed that the revision period end 50 minutes before the start of the delivery time block, rather than the current 75 minutes. Thereafter, the RTM bidding window would open.*

NGEL Submission:

1. NGEL sincerely appreciates the initiative taken by the Hon'ble Commission in issuing the Discussion Paper on *"Shortening the Scheduling Timeline for Real Time Markets in India"*. The proposed measures towards reducing the scheduling and gate closure timelines are progressive steps towards improving market efficiency, enhancing grid flexibility, and enabling better integration of renewable energy into the grid.

2. It is respectfully submitted that with the implementation of the IEGC, 2023 w.e.f. 01.10.2023, the forecasting and scheduling process for Wind-Solar (WS) Generators has become significantly more challenging. Under the existing framework, any revision in schedule becomes effective only from the 7th/8th time block, as against the 4th time block under the erstwhile IEGC, 2010 provisions.

3. The increase in the schedule revision lead time has adversely impacted the ability of RE generators to undertake accurate intraday schedule revisions. Renewable energy generation, particularly solar and wind generation, is inherently dependent upon dynamic weather parameters such as solar irradiance, cloud movement, wind speed, rainfall, sandstorms and other localized atmospheric conditions, which are highly volatile and difficult to predict accurately two hours in advance.

4. In practical operation, weather conditions may change significantly within a short duration, thereby resulting in substantial deviation between scheduled and actual generation. Since revised schedules become effective only after 7th/8th time blocks, RE generators are unable to align their schedules with real-time generation conditions, leading to avoidable DSM implications despite best forecasting efforts.

5. In this regard, the proposal of the Hon'ble Commission to reduce the schedule revision timeline and shorten the gate closure period is a welcome step. However, it is submitted that for Variable Renewable Energy generators, including Wind-Solar generators, the schedule revision timeline may be further reduced and made effective from the 4th time block or as close to the time of dispatch as technically feasible.

6. Enabling faster schedule revisions for RE generators would provide the following benefits:

- Improve forecasting accuracy and facilitate better alignment of schedules with actual generation.
- Reduce avoidable DSM exposure for RE generators arising due to sudden weather variations.
- Enhance grid balancing and system reliability through more realistic and responsive scheduling.
- Promote efficient participation of RE generators in RTM and ancillary services markets.
- Support larger integration of renewable energy capacity into the grid in line with national energy transition objectives.

7. It is further submitted that enabling near real-time schedule revisions for renewable generators would not only improve commercial certainty for RE developers but would also contribute towards overall grid security and operational efficiency, as schedules would better reflect actual generation capability closer to the delivery period.

8. In view of the above, it is requested that the schedule revision mechanism for Wind-Solar generators may kindly be reconsidered and revised such that schedule revisions become effective from the 4th time block or the nearest technically feasible time block prior to dispatch. This would significantly improve forecasting efficiency, reduce DSM burden, and facilitate smoother renewable energy integration into the national grid.

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